

UNITED STATES DISTRICT COURT
DISTRICT OF VERMONT

KSENIIA PETROVA,)	
)	
Petitioner,)	Case No. 2:25-cv-00240-CR
)	
v.)	PETITIONER'S PROPOSED
)	WITNESS LIST
U.S. DEPARTMENT OF HOMELAND)	
SECURITY; KRISTI NOEM, Secretary of the)	
U.S. Department of Homeland Security, in her)	
official capacity; THERESA MESSIER,)	
Superintendent, Chittenden Regional Correctional)	
Facility, in her official capacity,)	
)	
Respondents.)	
)	

Petitioner Kseniia Petrova respectfully submits the following list of witnesses for the bail hearing scheduled for May 28, 2025:

1. Dr. Michael D. West (via Zoom)

Dr. West is a cell and molecular biologist with over 40 years of experience in biological and medical research relating to the biology of embryonic development and aging.

Expected Testimony:

Dr. West will testify regarding (a) the nature and significance of Ms. Petrova's scientific work; and (b) the characteristics of the research samples Ms. Petrova attempted to bring with her into the United States on February 16, 2025.

Supporting Materials:

Declaration and CV submitted concurrently.

2. Cora Anderson (in person)

Research Assistant, Harvard Medical School

Expected Testimony:

Ms. Anderson, a colleague of Ms. Petrova, will provide testimony regarding Ms. Petrova's character and affirm that Ms. Petrova poses neither a danger to the community nor a flight risk.

Supporting Materials:

Written statement at Dkt. 32-2, pp. 25–26; CV submitted concurrently.

3. Mariia Diakova (in person)

Bioinformatics Scientist, Harvard Medical School

Expected Testimony:

Ms. Diakova will likewise testify to Ms. Petrova's professional dedication and strong character and confirm that she poses no danger to the community or risk of flight.

Supporting Materials:

Letter to ICE at Dkt. 32-2, pp. 29–35; CV submitted concurrently.

4. Dr. Marc Kirschner (in person)

Professor of Systems Biology, Harvard Medical School

Expected Testimony:

Dr. Kirschner, head of the laboratory in which Ms. Petrova conducts her research, will testify regarding her essential contributions to the lab's work and the harm caused by her detention.

Supporting Materials:

CV and lab web page submitted concurrently.

Dated: May 28, 2025

Respectfully submitted,

/s/ Brian Scott Green

Brian Scott Green
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing Proposed Witness List filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

Dated: May 28, 2025

By: /s/ Gregory Romanovsky
Gregory Romanovsky